

# MEMO

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**DATE:** December 14, 2006

**TO:** CEHD Committee

**FROM:** Lynn Harris, Manager of Community Development, 213 236 1875, harris@scag.ca.gov

**SUBJECT:** Transmittal of Public Comments Received at 15 Subregional Growth Forecast/RHNA Workshops

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**BACKGROUND:**

The Community Development Division has completed the 15 subregional workshops held throughout the six county region during October and November, 2006. The workshop format was such that participants were afforded the opportunity to both engage in interactive review of maps and information as well as enter public comments formally into the record of RHNA/Forecast proceedings at each meeting.

The attachment to this item is a summary of all comments received in the formal comment period of the workshops. Item 7.1 on the December 14, 2006 CEHD Agenda presents a summary of staff observations and comments discussed in the rest of the workshop time.



**SOUTHERN CALIFORNIA  
ASSOCIATION of GOVERNMENTS**

## **Summary of Public Comments**

### **Subregional Integrated Growth Forecast/RHNA Workshop**

#### **Western Riverside Council of Governments**

**Monday, October 30, 2006 – 9:30 am to 1:30 pm**

**WRCOG Office, Conference Room 2A & 2B**

**4080 Lemon Street, Riverside, CA**

There were no public comments.



## **Summary of Public Comments**

### **Subregional Integrated Growth Forecast/RHNA Workshop San Gabriel Valley Council of Governments**

**Monday, October 30, 2006 – 1:00 pm to 5:00 pm  
Garvey Community Center – FTTP Room  
9108 Garvey Avenue, Rosemead, CA**

1. Jack Wong, City of Monterey Park, inquired whether there would be another opportunity after the workshops to review the maps, and what incentives were being developed to address a city's share of the regional housing need. Joe Carreras, SCAG staff, provided information regarding a second public hearing to be scheduled by SCAG which could include a review of the maps. Mr. Carreras also noted that the final methodology for RHNA had not been adopted by SCAG, and this final methodology would describe incentives and provide another opportunity for input.
2. Charles LaClaire, City of Pomona, noted that it was good to come together and discuss these issues, but expressed his frustration with SCAG and the RHNA process in general in requiring cities to provide more housing. Mr. LaClaire also stated that he felt cities are trapped in having to meet RHNA numbers, and that the State may change the law to penalize cities that cannot meet their numbers. Finally, he asked for clarification regarding how SCAG came to get its number for the regional construction need, and what information was used to derive the number. Susan DeSantis, SCAG consultant, explained that existing state law does not require cities to build the number of housing units allotted to them, but to plan to build these units as part of their housing elements.
3. Bill Trimble, City of Pasadena, mentioned that during the last RHNA cycle, Pasadena was required to plan to build 300 units per year. He noted that under the Integrated Growth Forecast, Pasadena is required to plan to build 600 units annually after 2015. Mr. Trimble said this number is unrealistic in that Pasadena is built out and cannot produce this number of units per year. He stated that it is not a reasonable forecast and ought to be reconsidered. Mr. Trimble also expressed concern with possible changes in state law in the future using these set of numbers, and how the San Gabriel Valley subregion is very close to reaching its capacity of 60,000 for housing. He indicated that this could mean that cities will need to amend general plans to increase capacity in order to get a certified housing element. Finally, Mr. Trimble requested that TAZ levels at 5-year increments be noted on the maps.



## **Summary of Public Comments**

### **Subregional Integrated Growth Forecast/RHNA Workshop**

#### **San Gabriel Valley Council of Governments**

**Monday, October 30, 2006 – 1:00 pm to 5:00 pm**

**Garvey Community Center – FTTP Room**

**9108 Garvey Avenue, Rosemead, CA**

4. Grace Eng, San Gabriel Valley Council of Governments, expressed frustration with being unable to understand how the Integrated Growth Forecast was derived by SCAG and the methodology for the proposed city allocations. She stated that it is difficult to determine if the numbers are correct if cities do not understand the projected numbers. She gave the example of the Goldline Foothill Extension project, and that if this project does not get built by 2014, the projection for housing in the surrounding area according to the forecast would be too high.
5. Jeff Kugel, City of Covina, noted that SCAG's projection of 200-300 units would be difficult in that most of Covina's land use is single-family residential. He stated that in-fill development only replaces existing units and does not result in increased units, and that converting commercial areas to residential use is not viable because of the needed sales tax revenue generated from commercial use. He mentioned that City of Covina has adopted development impact fees and is looking to establish community facility districts, and that he would hope that the State HCD would look at these efforts in assessing its updated housing element.
6. Mihn Thai, City of El Monte, asked when cities would be seeing the revised maps. Susan DeSantis, SCAG consultant, stated that city information would be incorporated into the maps and that there would likely be another set of workshops for reviewing the maps. Joann Africa, SCAG staff, noted that no additional workshops are scheduled at the time, but that SCAG would be scheduling a second public hearing related to RHNA which would discuss information gathered from these workshops.
7. Julie Moore, Los Angeles County Regional Planning Dept., expressed concern with accuracy of SCAG's subregional and county numbers. She asked when should her agency provide information to SCAG about this. Joann Africa, SCAG staff, stated that input from local agencies should be submitted to SCAG sooner than later so that SCAG could properly assess the information. Joe Carreras, SCAG staff, concurred and stated that information could be sent to him or Ma'Ayn Johnson of SCAG.



## **Summary of Public Comments**

### **Subregional Integrated Growth Forecast/RHNA Workshop Coachella Valley Council of Governments**

**Tuesday, October 31, 2006 – 9:30 am to 1:30 pm  
73310 Fred Waring Drive, Suite 119  
Palm Desert, CA 92260**

1. Corrie Kates, City of Indian Wells/TPS Committee, expressed concern with the vacancy and seasonal rate. He explained that some of the cities in the valley are affected by seasonal population affecting employment and transportation, which warrant additional analysis on the growth projections and which should also account for the seasonal trend, market conditions, and the current reduction of housing and employment. He also felt there were discrepancies with the distribution calculations and felt the densities demonstrated in the land use categories for subregions were unrealistic or unaccounted in certain areas of Riverside County. In addition he recommended that the tribal lands, although not mandated, be included within the calculations since they do have an influence on housing, job balances, and transportation. Lastly, he suggested a review of the criterion used to determine the density of reserved land, the appeal process, and the methodology used to establish the criterion.
2. Melanie Fesmire, City of Indio, City Council, in response to the previous comment, added that non-seasonal communities in the valley are also affected and that parts of the valley, as well as the whole valley should be taken into consideration.
3. Kim Clinton/Randal Bynder, City of Rancho Mirage. Submitted Public Comment Card only stating, "Predictions beyond 2025 are speculative, our city will be built out by 2010-2015. Annexations of Indian lands are problematic. There are too many variables – inadequate information."
4. Mario Aguirre, City of Indio. Submitted Public Comment Card only stating, "When will the decision for "delegation be made?" and "What is the purpose of delegation?"
5. Jennifer Wellman, City of Blythe. Submitted Public Comment Card only stating "How are units constructed between 1/1/2005 and allocation of RHNA #'s going to be addressed?"



## **Summary of Public Comments**

### **Subregional Integrated Growth Forecast/RHNA Workshop Coachella Valley Council of Governments**

**Tuesday, October 31, 2006 – 9:30 am to 1:30 pm  
73310 Fred Waring Drive, Suite 119  
Palm Desert, CA 92260**

6. David Petritz, City of Coachella Valley. Submitted Public Comment Card only stating "Tribal Land should be taken account of particularly in relationship to transportation planning. In our city we have tribal land situated both within and adjacent to the city limits."
7. Craig Ewing, City of Palm Springs. Submitted Public Comment Card only stating, "Tribal Reservations should be mapped on: 1) the 2035 scenario; and 2) household and employment numbers in reservation should be broken down separately too."
8. Jennifer Wellman, City of Blythe. Submitted Public Comment Card only stating, "Credit for units constructed during the "gap" should be given."



**SOUTHERN CALIFORNIA  
ASSOCIATION of GOVERNMENTS**

## **Summary of Public Comments**

### **Subregional Integrated Growth Forecast/RHNA Workshop City of Los Angeles**

**Wednesday, November 1, 2006 – 8:00 am to 12:30 pm  
Los Angeles City Hall, Room 1035  
200 N. Spring Street, Los Angeles, CA**

**There were no public comments.**



**SOUTHERN CALIFORNIA  
ASSOCIATION of GOVERNMENTS**

## **Summary of Public Comments**

### **Subregional Integrated Growth Forecast/RHNA Workshop Imperial Valley Association of Governments**

**Wednesday, November 1, 2006 – 1:00 pm to 5:00 pm  
El Centro Chamber of Commerce, Board Room  
1095 South 4<sup>th</sup> Street, El Centro, CA**

**There were no public comments.**





**SOUTHERN CALIFORNIA  
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## **Summary of Public Comments**

### **Subregional Integrated Growth Forecast/RHNA Workshop Westside Cities Council of Governments**

**Friday, November 3, 2006 – 8:00 am to 12:30 pm  
West Hollywood City Hall  
8300 Santa Monica Boulevard, West Hollywood, CA**

**There were no public comments.**



**SOUTHERN CALIFORNIA  
ASSOCIATION of GOVERNMENTS**

## **Summary of Public Comments**

### **Subregional Integrated Growth Forecast/RHNA Workshop**

#### **Gateway Cities Council of Governments**

**Monday, November 6, 2006 – 1:00 pm to 5:00 pm**

**16401 Paramount Boulevard, Second Floor**

**Paramount, CA**

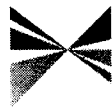
1. Gary Jones, City of Signal Hill, noted how the passage of Proposition 90 (currently on the November ballot) could affect a city's ability to rezone and acquire land for higher density use and low income housing.
2. Chuck Ebner, City of Lakewood, expressed his frustration with SCAG in not being made aware of other SCAG actions relating to the RHNA process.
3. Robert Lopez, City of Cerritos, submitted a public comment card, noting the following: (1) It has not been made clear what enforcement actions would be taken for not building or meeting one's RHNA allocation; (2) cities who overbuilt in the last period should be credited in the next period; (3) data on compliance, both by jurisdiction and income group, should be maintained in one central collective source; and (4) because RHNA requirements are being opposed by residents, SCAG and HCD need to have extensive outreach efforts to convince the public of the policies with which cities are required to comply.

## Summary of Public Comments

### **Subregional Integrated Growth Forecast/RHNA Workshop Orange County Council of Governments**

Tuesday, November 7, 2006 – 8:00 am to 5:30 pm  
Huntington Beach City Hall  
2000 Main Street  
Huntington Beach, CA 92648

1. Tracy Soto, City of Anaheim, requested the Orange County projections that are being developed by the CDR and up for adoption by the OCCOG Board on November 16, 2006 be submitted to SCAG for public input on the Regional Housing Needs Assessment (RHNA) and the 2007 Regional Transportation Plan (RTP); however, they feel the OCP most accurately reflects the future growth in the city and embraces the concepts that are in the Compass and allocates housing and employment to improve the jobs housing balance and use of transit.
2. Justina Willkom, City of Tustin, reported that the city objects to the RHNA replacement need numbers. The draft replacement need numbers for Tustin includes 985 military units at the Marine Corps Air Station in Tustin. The objection is based on demolished housing units at the former Marine Corps Station that were not properly counted as replacement housing units. The 985 units were vacated over a period of time with 527 units vacant in 1998 and all of the units vacant as of 1999. These housing units were later demolished and reported to the Department of Finance (DOF). The 985 housing units were counted in the last RHNA as vacant units and now are counted as demolished units, again, these units are unique in that they were never part of the city housing units; these units were available to military personal and not to the general public and therefore should not be considered as part of the city's housing units. She continued by saying at the last round of RHNA the city went through the appeals process and submitted three (3) appeals and that SCAG had denied the appeals even though they acknowledged the error but indicated that could not adjust the error since it would require a redistribution of numbers to other jurisdictions. Tustin believes this error was made by SCAG and that it should have been corrected by SCAG and not by other jurisdictions. Also, following the RHNA and after the denial of appeals, SCAG's Executive Director assured city executives that the error would be corrected, however, the same error is found in the current RHNA. Tustin believes that the replacement need error resulting from the military housing is unique and should be given re-consideration. Tustin also believes that the error needs to be corrected immediately and not through the appeal



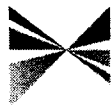
## **Summary of Public Comments**

### **Subregional Integrated Growth Forecast/RHNA Workshop Orange County Council of Governments**

**Tuesday, November 7, 2006 – 8:00 am to 5:30 pm  
Huntington Beach City Hall  
2000 Main Street  
Huntington Beach, CA 92648**

process. Lastly, Tustin should not be punished twice for correctly reporting to the DOF of the then vacant and now demolished military housing units.

3. Ruby Maldonado, County of Orange, read a letter (see Attachment 1) submitted regarding the Compass Map/Regional Transportation Plan (RTP) 2035 Test Scenario, specifically:
  - Jurisdictional Boundaries
  - Compass Map Growth Forecasts
  - AB 2158 Factors – Obstacles to Housing Development
4. Adrienne Gladson, City of Brea, noted in general, Brea is supportive of SCAG's efforts, but had an issue with the high employment projects for 2035. She suggested the employment counts be re-examined, particularly areas in the sphere of influence lands north of Brea, there's projected approximately 5,000-6,000 homes and about 3,000 jobs that should be reviewed in the RTP Update and the RHNA allocations.
5. Eileen McCarthy, staff attorney with the Public Law Center, expressed concern for the low to extremely low income households in need of affordable housing in Orange County. She also commented that she had not received formal notice and provided her contact information to SCAG staff for future notification of RHNA and housing related activities. In addition, she asked SCAG to remind its membership that they will have an obligation under state law to plan for extremely low income households during the next planning period and added she is looking forward to working with those jurisdictions to ensure compliance.
6. Barry Curtis, City of Irvine, commented that the city did not receive copies of the maps relative to RHNA or the RTP in advance, so he was unable to provide full comments and specific figures to correct the issues. He advised he would work with SCAG staff on changes and anticipates comments back from SCAG staff with the specific changes.



## **Summary of Public Comments**

### **Subregional Integrated Growth Forecast/RHNA Workshop Orange County Council of Governments**

**Tuesday, November 7, 2006 – 8:00 am to 5:30 pm**

**Huntington Beach City Hall**

**2000 Main Street**

**Huntington Beach, CA 92648**

7. Ruby Maldonado, County of Orange, provided additional comments from the county regarding the concern with preliminary RHNA and the methodology. She stated that the preliminary RHNA assigns over 25, 000 housing units for the County of Orange, which is 3,000 greater than the previous RHNA and housing element. They claim during the past 5 years they've lost over 50,000 acres of developable land to incorporations and annexations and the county is concerned that the RHNA could be higher than last time when the amount of remaining unincorporated area has greatly decreased; not just to incorporations and annexations but to increase protected open space which can no longer be available for development. The county also felt it was overburdened during the previous RHNA period and that it is still inequitable and unreasonable given that there has been a decrease of remaining land in the unincorporated areas.
8. Larry Longenecker, City of Laguna Niguel, stated that Laguna Niguel will be built out after 350 units and the RHNA allocation is approximately 559 units leaving over 200 units that the city doesn't have appropriate lands suitable for residential development. He continued to say regardless of zoning the AB 2158 factors in relation to land that is suitable for conversion to residential use or increase residential densities but with the city's housing staff being relatively new, three quarters of the housing stock was constructed after 1985. There are no residential properties that have a potential to be redeveloped at higher densities and the AB 2158 factor requires you consider the potential for increased residential development. Similarly, with commercial projects it's all relatively new construction; only 4% of the cities land is zoned commercial and there isn't the potential for residential development of commercial properties.
9. Casar Covarrubias, Kennedy Commission. Submitted Public Comment Card only stating, "We would like an opportunity for an effective public participation forum for community members, i.e., p.m. hours (evening), after work and availability of materials for members of the general public. What future opportunities will be offered?"

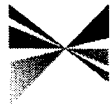


## **Summary of Public Comments**

### **Subregional Integrated Growth Forecast/RHNA Workshop Orange County Council of Governments**

**Tuesday, November 7, 2006 – 8:00 am to 5:30 pm  
Huntington Beach City Hall  
2000 Main Street  
Huntington Beach, CA 92648**

10. Julie Gonzalez, City of Orange. Submitted Public Comment Card only stating, "City of Orange supports the Center for Demographic Research, Orange County, projections for RHNA base projections.
11. Charles Wilson, City of Mission Viejo. Submitted Public Comment Card and a letter (see Attachment 2) with comments outlining:
  - Second Hearing on the Integrated Growth Forecast
  - SCAG Growth Forecasts
  - SCAG Compass Blueprint Maps
  - SCAG RHNA Methodology
12. John Montgomery, City of Laguna Beach. Submitted Public Comment Card and statement (see Attachment 3) stating "The household forecast does not take into account the city's environmental and circulation constraints! It is too high! There is very limited land suitable for development. See our housing element. The city's land use element is out-of-date!"



**SOUTHERN CALIFORNIA  
ASSOCIATION of GOVERNMENTS**

## **Summary of Public Comments**

### **Subregional Integrated Growth Forecast/RHNA Workshop**

#### **San Bernardino Associated Governments**

Tuesday, November 7, 2006 – 1:00 pm to 5:30 pm

San Bernardino Associated Governments, Super Chief Room

1170 W. 3<sup>rd</sup> Street, San Bernardino, CA

There were no public comments.



**SOUTHERN CALIFORNIA  
ASSOCIATION of GOVERNMENTS**

## **Summary of Public Comments**

### **Subregional Integrated Growth Forecast/RHNA Workshop North Los Angeles County**

**Wednesday, November 8, 2006 – 8:00 am to 12:30 pm  
City of Santa Clarita City Hall  
23920 Valencia Boulevard, Santa Clarita, CA**

**There were no public comments.**





**SOUTHERN CALIFORNIA  
ASSOCIATION of GOVERNMENTS**

## **Summary of Public Comments**

### **Subregional Integrated Growth Forecast/RHNA Workshop Las Virgenes Malibu**

**Wednesday, November 8, 2006 – 1:00 pm to 5:30 pm  
Agoura Hills Civic Center  
30001 Ladyface Court, Agoura Hills, CA**

**There were no public comments.**



**SOUTHERN CALIFORNIA  
ASSOCIATION of GOVERNMENTS**

## **Summary of Public Comments**

**Subregional Integrated Growth Forecast/RHNA Workshop  
South Bay Cities Council of Governments**

**Thursday, November 9, 2006 – 8:00 am to 12:30 pm**

**Carson Community Center**

**701 E. Carson Street, Carson, CA**

**There were no public comments.**



## **Summary of Public Comments**

### **Subregional Integrated Growth Forecast/RHNA Workshop Ventura Council of Governments**

**Thursday, November 9, 2006 – 1:30 pm – 5:00 pm  
601 Carmen Drive  
Camarillo, CA 93010**

1. Chris Stephens, County of Ventura, stated that the county has already submitted their written comments to SCAG. He provided a power point presentation highlighting their comments. (Copy of Power Point presentation not provided to SCAG.)
2. Jill Fioravanti, Cabrillo Economic Development Corporation, stated that her organization published a report in 2005 of a study that looked into new housing construction actually produced in Ventura County during the years of 1990 – 2000 compared to what was actually planned.

She continued that overall Ventura County as a whole built 91% of its target from 1990 – 2000, and that 28,500 units were produced compared to the target of 31,202 units that was set.

3. Barbara Macri-Ortiz, Advocates for Civic Justice, asked that the cities keep in mind the quality of life in their communities when making their decisions. She raised concern with allocations for the low and very low income categories.
4. Chris Williamson, City of Oxnard, recommended reading his article in the January issue of Planning Magazine regarding planning projections.

He also recommended reading Page 82 and 83 of the ICMA Read Book regarding planning projections.

5. Jeff Spector, City of Thousand Oaks, commented that the program may not be perfect but it is what we have to work with and maybe the building community should be more involved to get more legislation passed.



**SOUTHERN CALIFORNIA  
ASSOCIATION of GOVERNMENTS**

## **Summary of Public Comments**

### **Subregional Integrated Growth Forecast/RHNA Workshop**

#### **Arroyo Verdugo**

**Monday, November 13, 2006 – 1:00 pm to 5:30 pm**

**Buena Vista Library**

**300 N. Buena Vista, Burbank, CA**

**There were no public comments.**